

NOTICE OF COMMENCEMENT

A RECORDED COPY MUST BE POSTED ON THE JOB SITE AT TIME OF FIRST INSPECTION



CFN 2015R0330319
 OR BK 29627 Pg 3366 (1Pgs)
 RECORDED 05/22/2015 11:36:44
 HARVEY RUVIN, CLERK OF COURT
 MIAMI-DADE COUNTY, FLORIDA

 PERMIT NO. _____ TAX FOLIO NO. 00-2228-039-2390

 STATE OF FLORIDA:
 COUNTY OF MIAMI-DADE:

THE UNDERSIGNED hereby gives notice that improvements will be made to certain real property, and in accordance with Chapter 713, Florida Statutes, the following information is provided in this Notice of Commencement.

1. Legal description of property and street/address: BAYVIEW TOWERS CONDO NORTH Bldg. Unit B-805
2150 Sans Souci Blvd. B805
2. Description of improvement: INSTALL IMPACT WINDOWS/DOORS
3. Owner(s) name and address: GULAB MOORJANI PO BOX 110914
N. MIAMI, FL 33261

 Interest in property: _____
 Name and address of fee simple titleholder: _____

4. Contractor's name and address: Mediterranean Impact Windows 954-990-8363
1030 NE 43 CT. OAKLAND PARK, FL 33334

5. Surety: (Payment bond required by owner from contractor, if any)

 Name and address: _____
 Amount of bond \$ _____

6. Lender's name and address: _____

7. Persons within the state of Florida designated by Owner upon whom notices or other documents may be served as provided by Section 713.13(1)(a)7., Florida Statutes,
 Name and address: _____

8. In addition to himself, Owners designates the following person(s) to receive a copy of the Lienor's Notice as provided in Section 713.13(1)(b), Florida Statutes.
 Name and address: _____

9. Expiration date of this Notice of Commencement: (the expiration date is 1 year from the date of recording unless a different date is specified) _____

 Signature of Owner

 Print Owner's Name GULAB MOORJANI Prepared by

 Sworn to and subscribed before me this 8 day of May, 2015

 Notary Public Address: 2150 Sans Souci Blvd

 Print Notary's Name Elizabeth Poe

 My commission expires: May 12, 2018

8/04 PAGE3



ELIZABETH POE
 MY COMMISSION # FF 121965
 EXPIRES: May 12, 2018
 Bonded Thru Budget Notary Services

1 John D. Alessio (Bar No. 174900)
E-mail:john.alessio@procopio.com
2 Zagros S. Bassirian (Bar No. 299581)
E-mail:zag.bassirian@procopio.com
3 PROCOPIO, CORY, HARGREAVES &
SAVITCH LLP
4 525 B Street, Suite 2200
San Diego, CA 92101
5 Telephone: 619.238.1900
Facsimile: 619.235.0398

6
7 Attorneys for Defendants Gulab Moorjani, Seema Moorjani,
Sunil Moorjani, and Zubeida Moorjani

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF SAN DIEGO

10 DEEPAK MOORJANI,

11 Plaintiff,

12 v.

13 FLORADELIZA MOORJANI; GULAB
MOORJANI; JASWANT MOORJANI; SEEMA
14 MOORJANI; SUNIL MOORJANI; ZUBEIDA
MOORJANI,

15 Defendants.
16
17

Case No. 37-2021-00033119-CU-OR-CTL

**STIPULATION AND [PROPOSED]
ORDER TO FILE FIRST AMENDED
COMPLAINT**

Dept: C-65
Judge: Hon. Ronald F. Frazier

Complaint Filed: August 4, 2021
Trial Date: Not yet set

"IMAGED FILE"

18 Plaintiff DEEPAK MOORJANI ("Plaintiff") and Defendants GULAB MOORJANI,
19 SEEMA MOORJANI, SUNIL MOORJANI, and ZUBEIDA MOORJANI (hereinafter,
20 "Defendants"), though their counsel, hereby stipulate as follows:

21 1. WHEREAS, on August 4, 2021, Plaintiff filed a Complaint to: (a) Quiet Title; (b)
22 Cancellation of Instrument; and (c) Partition and Forced Sale;

23 2. WHEREAS, the parties met and conferred regarding Defendants' intended demurrer
24 to the Complaint;

25 3. WHEREAS, Plaintiff has agreed to file a First Amended Complaint no later than
26 November 23, 2021;

27 4. WHEREAS, as a result of Plaintiff's agreement to file a First Amended Complaint,
28 the parties agree that Defendants have no obligation to respond to the Complaint.

1 5. The parties agree that the execution of this stipulation shall not constitute a waiver of
2 any party's rights, interests or remedies relating to the prosecution or defense of the above action.

3 6. The parties agree that the execution of this stipulation shall not be construed as an
4 admission of liability on the part of Defendants, or any of them, as to any portions of the Complaint
5 or First Amended Complaint.

6 7. This stipulation may be executed electronically and electronic signatures may be used
7 in lieu of originals.

8 SO STIPULATED.

9
10 DATED: October 22, 2021

WRIGHT & SUPPLE LLP

11
12 By: 

Oriet Cohen-Supple
Mary Wright
Attorneys for Plaintiff Deepak Moorjani

13
14
15 DATED: October 22, 2021

PROCOPIO, CORY, HARGREAVES &
SAVITCH LLP

16
17
18 By: 

John D. Alessio
Zagros S. Bassirian
Attorneys for Defendants Gulab Moorjani,
Seema Moorjani, Sunil Moorjani, and
Zubeida Moorjani

19
20
21 **ORDER**

22 Based on the stipulation of the parties, and good cause appearing, the Court issues the
23 following Order:

- 24
- 25 1. Plaintiff shall file a First Amended Complaint on or before November 23, 2021.
 - 26 2. Defendants have no obligation to respond to the current Complaint filed on August 4,
27 2021.

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3. The execution of this stipulation shall not constitute a waiver of any party's rights, interests or remedies relating to the prosecution or defense of the above action.
4. The execution of this stipulation shall not be construed as an admission of liability on the part of Defendants, or any of them, as to any portions of the Complaint or First Amended Complaint.

Dated: _____

Hon. Ronald F. Frazier, Judge of the Superior Court

PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is PROCOPIO, CORY, HARGREAVES & SAVITCH LLP, 525 "B" Street, Suite 2200, San Diego, California 92101. On October 25, 2021, I served the within documents:

STIPULATION AND [PROPOSED] ORDER TO FILE FIRST AMENDED COMPLAINT

- ☐ **BY U.S. MAIL** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Diego, California addressed as set forth below. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on the same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.
- ☐ **BY ELECTRONIC MAIL SERVICE** based upon court order or an agreement of the parties to accept service by electronic transmission, by electronically mailing the document(s) listed above to the e-mail address(es) set forth below, or as stated on the attached service list and/or by electronically notifying the parties set forth below that the document(s) listed above can be located and downloaded from the hyperlink provided. No error was received, within a reasonable time after the transmission, nor any electronic message or other indication that the transmission was unsuccessful.
- ☒ **BY ELECTRONIC SERVICE (via One Legal Online Court Services):** I served upon the designated recipients via electronic transmission through the One Legal system on October 25, 2021. Upon completion of said transmission of said documents, a certified receipt is issued to filing party acknowledging receipt by One Legal's system. Once One Legal has served all designated recipients, proof of electronic service is returned to the filing party.

Oriet Cohen-Supple, Esq.

Mary Wright, Esq.

Wright & Supple LLP

600 Key Route Blvd.

Albany, CA 94706-1423

Telephone: (510) 495-5749

Email: oriet@wrightandsupple.comEmail: mary@wrightandsupple.com*Attorneys for Plaintiff Deepak Moorjani*

- ☒ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 25, 2021, at San Diego, California.


Melissa Avitia Turpin

Event Report

Event ID: 2023-024092

Call Ref #: 931

Date/Time Received: 03/06/23 13:00:57

Rpt #:	Call Source: PHONE	Prime 152 Unit: WHITMORE, TRAVIS M	Services Involved			
			LAW			
Location: 500 RIVERSIDE DR						
X-ST:	EAGLE POINT DR		Jur: WCS	Service: LAW	Agency: ROSS	
	EAGLE POINT DR		St/Beat: ROSS	District: NRTH	RA: 620	
Business:		Phone: () -			GP: ROSS	
Nature: SUSPICIOUS INCIDENT	Alarm Lvl: 1	Priority: 2	Medical Priority:			
Caller: MOORJANI,DEEPAK				Alarm:		
Addr: 500 RIVERSIDE DR	Phone: (508) 704-1111			Alarm Type:		
Vehicle #:	St:	Report Only: No	Race:	Sex:	Age:	
Call Taker: NVAUGHAN	Console: 5004					
Geo-Verified Addr.: Yes		Nature Summary Code:	Disposition: COMP	Close Comments:		
<p>Notes: CONTACTED 173 AND ADVISED THAT THE INCIDENT OCCURRED BETWEEN 1970 AND 1998 [03/10/23 12:16:43 JVARGAS]</p> <p>SPOKE WITH CALLER AND HE ADVISED HE WANTED A REPORT REGARDING DOMESTIC VIOLENCE FOR 1970-1990. CALLER STATED FATHER USED TO BEAT MOTHER. CALLER ADVISED HE IS CURRENTLY TRYING TO REPORT ELDER ABUSE FOR HIS MOTHER SINCE HIS BROTHER WONT LET HER LIVE IN HER HOUSE IN CALIFORNIA. CALLER STATED HE WANTED A REPORT TO SHOW A PATTERN OF ABUSE. CALLER LIVES IN CALIFORNIA, MOTHER LIVES IN CALIFORNIA, AND FATHER LIVES IN FLORIDA. I ATTEMPTED TO CALL THE MOTHER AND DID NOT GET AN ANSWER. I THEN SPOKE WITH FATHER AND HE DENIED ALL ALLEGATIONS.</p> <p>NFI. [03/06/23 14:01:23 Unit:152]</p> <p>REPORTING DOMESTIC VIOLENCE BETWEEN MOTHER AND FATHER THAT HAPPENED IN THE 70s 80s AND 90s. CALLER AND MOTHER ARE IN DIFFERENT CITIES IN CALIFORNIA. FATHER IS IN FLORIDA. SEEKING REPORT AT THE ADVICE OF LEGAL COUNSEL FOR A PROTECTIVE ORDER. [03/06/23 13:04:55 NVAUGHAN]</p>						

Times

Call Received: 03/06/23 13:00:57	Time From-Call Received		
Call Routed: 03/06/23 13:04:55	000:03:58	Unit Reaction: : :	(1st Dispatch to 1st Arrive)
Call Take Finished: 03/06/23 13:04:55	000:03:58	En-Route: : :	(1st Dispatch to 1st En-Route)
1st Dispatch: 03/06/23 13:06:18	000:05:21 (Time Held)	On-Scene: : :	(1st Arrive to Last Clear)
1st En-Route:	: :		
1st Arrive:	: :	(Reaction Time)	
Last Clear: 03/06/23 14:02:13	001:01:16		

Radio Log

Unit	Empl ID	Type	Description	Time Stamp	Comments	Close Code	User
152	450914	D	Dispatched	03/06/23 13:06:18	Stat/Beat: ROSS		NVAUG
152	450914	C	Cleared	03/06/23 14:02:13	COMP [COMP]	COMP	JVARGA

Event Log

Unit	Empl ID	Type	Description	Time Stamp	Comments	Close Code	User
		TR	Time Received	03/06/23 13:00:57	By: PHONE		NVAUG
		ENT	Entered Street	03/06/23 13:01:18	500 RIVERSIDE DR		NVAUG

Unit	Empl ID	Type	Description	Time Stamp	Event Log	Close Code	User
					Comments		
		ENT	Entered	03/06/23 13:01:36	MOORJANI,TEEPAK		NVAUG
		ENT	Entered CallerPhone	03/06/23 13:01:44	MOORJANI,TEEPAK		NVAUG
		ENT	Entered Nature	03/06/23 13:01:50	DOMESTIC VIOLENCE		NVAUG
		CHG	Changed Nature	03/06/23 13:02:09	DOMESTIC VIOLENCE --> CIVIL		NVAUG
		VCH	Viewed Call History	03/06/23 13:03:07	Location Information		NVAUG
		ENT	Entered Remarks	03/06/23 13:04:55			NVAUG
		FIN	Finished Call Taking	03/06/23 13:04:55			NVAUG
		CHG	Changed Nature	03/06/23 13:05:29	CIVIL DISPUTE / COMPLAINT -->		NVAUG
		VEV	Viewed Event	03/06/23 13:06:13	User First Viewed Event CAD		JFLAGE
		VEV	Viewed Event	03/06/23 13:07:10	User First Viewed Event CAD		SSHAWV
		ARM	Added Remarks	03/06/23 14:01:23			Unit:152
		CHG	Changed	03/10/23 12:15:48	MOORJANI,TEEPAK -->		JVARGA
		ARM	Added Remarks	03/10/23 12:16:43			JVARGA